

Application No. 09/470,875  
Response dated October 6, 2005  
Reply to Office Action of April 6, 2005

Atty. Docket No. 2207/6843  
**PATENT APPLICATION**

### REMARKS/ARGUMENTS

Claims 1-5 and 7-56 are pending in the application. Claims 1, 2, 4, 5, 7-10, 13-18, 21, 22, 24-27, 29-32, 34,43, 45, 46, 48-51, and 53-56 are rejected under 35 U.S.C. §103(a) as being unpatentable over USP 6,108,494 (Eisenhofer-1), in view of USP 5,881,270 (Worthington), and in further view of USP 6,339,836 (Eisenhofer-2). Claims 3, 7, 20, 23, 28, 33, 36, 44, and 47 are rejected under 35 U.S. C. §103 (a) as being unpatentable over Eisenhofer-1 in view of Worthington and in further view of Eisenhofer-2, and in further view of USP 6,175,946 (Ly). Claims 11 and 12 are rejected under 35 U.S. C. §103 (a) as being unpatentable over Eisenhofer-1 in view of Worthington and in further view of Eisenhofer-2 and in further view of USP 5,881,267 (Dearth-1). Claim 19 is rejected under 35 U.S. C. §103 (a) as being unpatentable over Eisenhofer-1 in view of Worthington and in further view of Eisenhofer-2, and in further view of USP 5,732,247 (Dearth-2). Claims 11 and 12 are rejected under 35 U.S. C. §103 (a) as being unpatentable over Eisenhofer-1 in view of Worthington and in further view of Eisenhofer-2 and in further view of Dearth-2.

The Office Action asserts that Eisenhofer ('494) teaches "data format conversions" at column 5 lines 52-67, column 6 lines 1-20, column 12 lines 34-67, and column 13 lines 1-5 and "an interface for the simulators" at column 5 lines 52-67 and column 6 lines 1-20. Applicants respectfully assert that Eisenhofer does not disclose or suggest at least "...operating each interface to convert the messages between a data format associated with the fixed configuration backplane and a data format associated with the simulator associated with the interface" as recited in independent claim 1.

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As argued previously column 5 lines 52-67 and column 6 lines 1-20 of Eisenhofer disclose a simulation backplane 210 coupled to a plurality of simulators 231-234 through their respective interfaces 241-244. The simulation backplane 210 coordinates event transaction processing, state translation, event arbitration, and manages synchronization processing among the simulators 231-234. The Office Action responds similarly, asserting that Eisenhofer discloses a plurality of simulation module items 231, 232, 233 and 234 and simulation interfaces items 241, 242, 243 and 244. The Office Action further asserts that column 12 lines 40-41 disclose that the simulation backplane performs data type conversion. Column 12 line 40-41 state:

In addition to synchronizing the simulators, the simulation backplane 210 also performs data type conversion and transfers boundary event information, such as signal state.

Additionally, column 6 line 15 of Eisenhofer describes: "[w]hen a boundary event occurs between simulators, *the simulation backplane 210* synchronizes the simulators so that they are at the same point in time and, before transferring any event information, *it converts* the event information to a representation usable by the target simulator" (*emphasis added*). Furthermore, column 12 line 4 states: "[i]n addition to synchronizing the simulators, *the simulation backplane 210* also performs data type conversion and transfers boundary event information, such as signal state" (*emphasis added*). Also, column 12 lines 34-61 states: "[t]herefore, before transferring the signal state from the source simulator to one or more target simulators, signal mapping (also referred to as data type conversion) is performed between the source and target representations in order to achieve consistent signal state representations. Exemplary conversions include the point-to-point signal mapping or mapping to intermediate simulation backplane types... Either

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conversion mechanism may be implemented with *a user-programmable state translation table*” (*emphasis added*). Therefore, the Eisenhofer reference discloses performing data type conversion with a simulation backplane possibly in conjunction with a user-programmable state translation table.

However, Applicants respectfully submit that none of the cited sections of Eisenhofer teach, suggest or disclose “...*operating each interface to convert the messages between a data format associated with the fixed configuration backplane and a data format associated with the simulator associated with the interface*” as specifically described in the embodiment of independent claim 1. For further support, lines 15-19 of page 6 of the specification disclose “[e]ach SDI (“software based simulator-dependent interfaces”) converts the exchanged messages between the data format supported by its corresponding simulator and the data format supported by the simulation backplane”. Applicants respectfully assert that the specific limitation of the use of the interface (as recited in claim 1) to convert messages between data formats is not disclosed anywhere in Eisenhofer. Instead, as discussed above, the conversion between data types is accomplished with the use of the simulation backplane or a user-programmable state translation table in Eisenhofer.

Therefore, since the specific limitations “operating each interface to convert the messages between a data format associated with the fixed configuration backplane and a data format associated with the simulator associated with the interface” are not taught or suggested anywhere in the Eisenhofer reference, claim 1 is in condition for allowance and the 35 U.S.C. 103(a) rejection should be withdrawn. Applicants respectfully submit that independent claims 21, 26, 29, 34, 40, 45, 51, 52, 53, 54, and 55 also contain the allowable limitations similar to the one

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described above, and are therefore allowable for similar reasons. Furthermore, Applicants submit that dependent claims 2-20, 22-25, 27-28, 30-33, 35-39, 41-44, and 46-50 are allowable as depending from allowable base claims.

It is believed that this Response places the application in condition for allowance, and early favorable consideration of this Amendment is earnestly solicited.

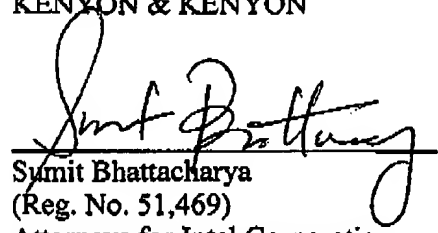
If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

The Office is hereby authorized to charge any fees, or credit any overpayments, to Deposit Account No. 11-0600.

Respectfully submitted,  
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Dated: October 6, 2005

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